

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOHN GARLAND, *et. al*, on behalf of themselves
and all other similarly situated employees of the New
York City Fire Department,

Plaintiffs,

-against-

NEW YORK CITY FIRE DEPARTMENT,
DANIEL A. NIGRO, in his official and individual
capacities, JOHN DOE #1-10, in their official and
individual capacities; and JANE DOE #1-10 in their
official and individual capacities,

Defendants.
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INDEX NO. _____

**AFFIDAVIT OF
CHRISTOPHER RAIMONDI
IN SUPPORT OF THE
PLAINTIFFS' MOTION**

STATE OF NEW YORK)
) ss.
COUNTY OF RICHMOND)

CHRISTOPHER RAIMONDI, being duly sworn deposes and states under penalty of perjury that:

1. I am a Plaintiff in this Action. I have not received a COVID-19 vaccine. I am a Lieutenant in the NEW YORK CITY FIRE DEPARTMENT ("FDNY"). I offer this Affidavit based upon my personal knowledge and conversations I have had with my fellow FDNY employees who have not received a COVID-19 vaccine.

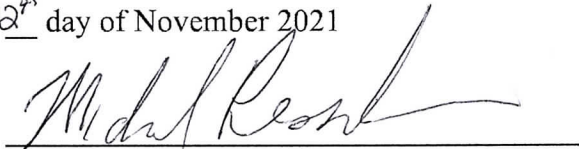
2. I was on medical leave until November 5, 2021. When I was reinstated to light duty on November 5, 2021, I was immediately placed on leave without pay ("LWOP") because of my COVID-19 vaccination status. I have not received my pay since November 5, 2021.

3. I have not received any charges or a hearing, which is my right pursuant to N.Y. City Administrative Code § 15-113. I have been placed on LWOP without any due process in violation of my constitutional property right to my pay. I have not received due process before I was suspended without pay in violation of my due process rights.

4. On behalf of the Plaintiffs and all others similarly situated, I am requesting that the Court grant the Plaintiffs a Temporary Restraining Order and a Preliminary Injunction, restoring our pay and barring the FDNY from terminating our employment without due process.


Christopher Raimondi

Sworn before me on this
22nd day of November 2021


Notary Public

